



370 Lexington Avenue, Suite 1101
New York, NY 10017

Tel (646) 560-3224

Fax (207) 421-9215

Yann Geron

ygeron@geronlegaladvisors.com

geronlegaladvisors.com

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VIA EMAIL AND ELECTRONIC FILING (MG.CHAMBERS@NYSB.USCOURTS.GOV)

The Honorable Martin Glenn
Chief United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, NY 10004-1408

Re: Madhu Grover, Debtor; Case No. 22-11730-mg; Trustee v. Grover; Adv. Pro. No. 23-01198-mg; Busche v. Grover; Adv. Pro. No. 23-01199-mg; Pandarinathan v. Grover; Adv. Pro. No. 23-01200-mg

Your Honor:

I am the chapter 7 trustee of the bankruptcy estate of Madhu Grover (the “Debtor”), the above-referenced debtor. This letter is being jointly submitted on behalf of each of the plaintiffs in the above-referenced adversary proceedings. For the reasons detailed below, the plaintiffs request that fact discovery be reopened for a period of 60 days, and that the deadline for the parties to submit their joint pre-trial order be extended accordingly.

As Your Honor may recall, despite their best efforts, the plaintiffs were unable to complete the deposition of the Debtor until June 13, 2024, one day prior to fact discovery deadline. The transcript of this deposition was not available until last week. The Debtor’s recent testimony raised several limited issues which require further investigation by the plaintiffs. Specifically, based upon a review of the transcript, the plaintiffs require additional documents relating to the Debtor’s purchase of the cooperative apartment known as Unit 4G, 440 East 56th Street, New York, New York. Also, plaintiff Pandarinathan requires additional documents and information from the brokerage firm which maintained the investment accounts at issue with respect to her dischargeability claims. Furthermore, plaintiff Busche requires limited additional discovery in light of the deposition testimony in order to prepare the motion seeking a determination of the effect of the underlying New York State Supreme Court Judgment with respect to his dischargeability claims.

The plaintiffs have conferred with Debtor’s counsel regarding this request and Ms. Woods has advised that the Debtor opposes this request.

While the plaintiffs do not wish to unreasonably delay these proceedings, based upon the Debtor's recent testimony, it became apparent that the newly sought documents and information are critical to the trial. Therefore, the plaintiffs respectfully request that the Court modify the case management order to extend the fact discovery deadline to September 16, 2024, and the related pre-trial order submission deadline to October 16, 2024.

The parties are available for a conference if Your Honor requires more information regarding this request.

Respectfully submitted,

s/ Yann Geron

Yann Geron

cc (via email):

Diane Bradshaw, Esq.
Nicole N. Santucci, Esq.
Mark Silver, Esq.
Adrienne Woods, Esq.

IT IS SO ORDERED.

Dated: July 11, 2024
New York, New York

/s/ Martin Glenn
MARTIN GLENN
Chief United States Bankruptcy Judge